

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re:

TEXAS REIT, LLC

Debtor

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Chapter 11

Case No. 24-10120-smr

**DEBTOR'S MOTION FOR CONTINUANCE OF HEARING ON MOTION TO SELL
REAL PROPERTY FREE AND CLEAR OF LIENS (8052-8090 WESTHEIMER ROAD)**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Texas REIT, LLC, Debtor herein, and files this Motion for Continuance of Hearing on Motion to Sell Real Property Free and Clear of Liens (8052-809 Westheimer), and in support thereof would show the following:

1. Debtor filed its Motion to Sell Real Property Free and Clear of Liens (8052-8090 Westheimer).
2. WCW Houston Properties, George Lee and two assignees of tax liens filed objections.
3. This motion involves the strip center owned by the Debtor. The Debtor has previously sought approval to sell the former Walgreen's location.
4. The two tracts are subject to a Reciprocal Easement Agreement. The purchaser on the former Walgreen's location has requested revisions to the REA. As Debtor has gotten deeper into the transaction, it has become clear that the Debtor will need to negotiate the revised REA with both parties in order to close either transaction.
5. Debtor is not prepared to go forward on the sale of 8052-809 Westheimer but believes it can get there with additional time. As a result, Debtor requests that the hearing presently scheduled for September 12, 2024 be continued.
6. Certificate of Conference. On September 9, 2024, I conferred with Eric Terry, Ty Sponsel and Howard Spector, the three objecting parties. Mr. Terry stated that he did not oppose a continuance. I did not hear from the other counsel.

Respectfully Submitted,

BARRON & NEWBURGER, P.C.

7320 N. Mopac Expy, Suite 400

Austin, Texas 78731

(866) 476-9103

/s/ Stephen Sather

Stephen Sather

State Bar No 17657520

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion was served by first class mail, postage prepaid and properly addressed, on September 9, 2024 to all parties listed on the attached Service List, to the persons listed below by email and electronically by the Court's ECF system to all parties registered to receive such service.

/s/ Stephen Sather

Stephen Sather

Label Matrix for local noticing
0542-1
Case 24-10120-smr
Western District of Texas
Austin
Mon Apr 1 08:59:44 CDT 2024

AGAPE
6161 Savoy Drive Suite 500
Houston, TX 77036-3326

Caz Creek Lending
118 Vintage Park Blvd No. W
Houston, TX 77070-4095

Competition Roofing, Inc.
7310 Fairview Street
Houston, TX 77041-2106

Dalio Holdings I, LLC
2425 West Loop South Suite 77027-4210

Harris County Tax Assessor
Po Box 4622
Houston, TX 77210-4622

Houston ISD
c/o Tara L. Grundemeier
Linebarger Goggan Blair & Sampson LLP
PO Box 3064
Houston, TX 77253-3064

John Quinlan
c/o Steven A. Leyh
Hoover Slovacek, LLP
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Houston, Texas 77056-5839

Omar Khawaja
c/o Steven A. Leyh
Hoover Slovacek, LLP
5051 Westheimer, Suite 1200
Houston, Texas 77056-5839

US Insurance Funding
8303 SW Freeway Suite 435
Houston, TX 77074-1691

Texas REIT, LLC
2450 Wickersham Lane, Suite 202
Austin, TX 78741-4744

Affordable Dumpster Rentals
6520 US Hwy 301 S Suite 112
Riverview, FL 33578-4324

City of Houston
c/o Tara L. Grundemeier
Linebarger Goggan Blair & Sampson LLP
PO Box 3064
Houston, TX 77253-3064

Cypress BridgeCo, LLC and Magnolia BridgeCo
c/o McDowell Hetherington LLP
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Houston, TX 77002-6706

Drew Dennett
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Houston Community College System
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IPFS Corporation
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Osama Abdullatif
c/o Steven A. Leyh
Hoover Slovacek, LLP
5051 Westheimer, Suite 1200
Houston, Texas 77056-5839

United States Trustee - AU12
United States Trustee
903 San Jacinto Blvd, Suite 230
Austin, TX 78701-2450

U.S. BANKRUPTCY COURT
903 SAN JACINTO, SUITE 322
AUSTIN, TX 78701-2450

Akin Gump Strauss Hauer & Feld LLP
1111 Louisiana Street, 44th Floor
Houston, TX 77002-5225

Clark Hill PC
500 Woodward Ave Suite 3500
Detroit, MI 48226-3485

Cypress BridgeCo, LLC and Magnolia BridgeCo,
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(p)OVATION SERVICES
ATTN BANKRUPTCY DEPT
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SUITE 125
AUSTIN TX 78746-6175

Houston ISD
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Houston, TX 77210-4668

Jetall Companies, Inc.
2425 West Loop South Suite 1100
Houston, TX 77027-4210

Nationwide Security
2425 W Loop S Ste.300
Houston, TX 77027-4207

Steadfast 829 Holdings, Inc.
c/o Rodney Drinnon
McCathern
2000 West Loop South Suite 1850
Houston, TX 77027-3744

WCW Houston Properties, LLC
Attn: Tami Kim Broker Associate/Attorney
6100 Corporate Drive, Suite 319
Houston, TX 77036-3433

WCW Houston Properties, LLC
c/o Matthew Kevin Powers
Burford Perry
909 Fannin, Suite 2630
Houston, TX 77010-1003

Wrinkle, Gardner & Company, PC
PO Box 1707
Friendswood, TX 77549-1707

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5051 Westheimer, Suite 1200
Houston, Texas 77056-5839

Stephen W. Sather
Barron & Newburger, PC
7320 N MoPac Expy, Suite 400
Austin, TX 78731-2347

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

FGMS Holdings, LLC
12000 Network Blvd., Bldg. B Suite 210
San Antonio, TX 78249

(d)FGMS Holdings, LLC
12000 Network Blvd., Bldg. B Suite 210
San Antonio, TX 78249

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|---------------------|----|
| End of Label Matrix | |
| Mailable recipients | 33 |
| Bypassed recipients | 0 |
| Total | 33 |